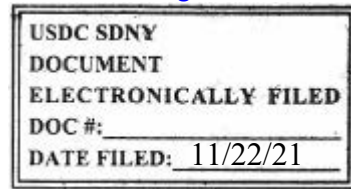




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November 19, 2021

VIA ECF

Judge Alison J. Nathan

United States District Judge

Thurgood Marshall United States Courthouse

40 Foley Square

New York, New York 10007

Re: ***Western Waterproofing Co. d/b/a Western Specialty Contractors v. Zurich American Insurance Co. et al., Case No.: 1:20-cv-3199***

Dear Judge Nathan,

We write on behalf of Defendants, Counterclaim-Plaintiffs, and Crossclaim-Plaintiffs BDG Gotham Residential, LLC (“Gotham”) and ZDG, LLC (“ZDG”) in regard to Plaintiff and Counterclaim-Defendant Western Waterproofing Company’s (“Western”) November 17, 2021, letter requesting a pre-motion conference to seek leave to file a summary judgment motion to seek dismissal of Gotham and ZDG’s counterclaims against Western (Dkt. No. 182). Gotham and ZDG respectfully request that the parties’ time to respond to Western’s request for a pre-motion conference (Dkt. No. 182) be extended eight days, from November 22, 2021, to November 30, 2021. Gotham and ZDG have not previously requested an extension to respond to Western’s letter.

Western has consented to this request.

The Court will not hold a motion on this matter. The Court GRANTS Defendants’ motions at Dkt. Nos. 183 and 186 to file responses by November 30, 2021, to Western’s request for leave to file a motion for summary judgment.

 11/22/21

SO ORDERED.

cc: All Counsel of Record (Via ECF)

Respectfully submitted,



Michael S. McNamara